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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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ORIGINAL 8-7-91

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

AUG 5 1 32 PM '91

In re Application of

ROSAMOND RADIO, INC.

For Construction Permit for a  
New FM Station on Channel 228A  
at Rosamond, California

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FCC File No. 91-10220MG

AUDIO SERVICES  
DIVISION

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FM EXAMINERS

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Chief, Mass Media Bureau

OPPOSITION TO OBJECTION

Rosamond Radio, Inc. ("Rosamond Radio") hereby opposes the informal objection filed by Diane K. Hitt ("Hitt") to the above-captioned application. Hitt, an applicant for a new FM station to operate on Channel 228A, at Rosamond, California, objects to the acceptance for filing and continued processing of Rosamond Radio's mutually-exclusive application for a new FM station at Rosamond.<sup>1/</sup> A brief explanation of Rosamond Radio's application is necessary in order to understand the nature of Hitt's objection.

1. Background.

In its application, Rosamond Radio employs the use of the Commission's contour protection procedures specified in § 73.215 of the Commission's Rules because Rosamond Radio's proposed antenna site is 100.68 kilometers from Station KRZE-FM, Ontario, California, and, as such, is short-spaced to KRZE by approximately 4

<sup>1/</sup> The period for filing petitions to deny Rosamond Radio's application has passed. The 30-day period set by the Commission's Public Notice (Report NA-147), released May 13, 1991 ended on June 17, 1991. Hitt's Objection was not filed until July 11, 1991. It is therefore identified by Hitt as an "informal objection," filed pursuant to § 73.3587 of the Commission's Rules. Because the time limits contained in Section 1.45 of the Commission's Rules do not apply to oppositions to informal objections, see 47 C.F.R. § 73.3587, Rosamond Radio is likewise responding "informally," i.e., without regard to the normal filing deadlines.

kilometers. Rosamond Radio utilizes § 73.213 of the Rules to determine its distance separation requirements because § 73.213 applies to applicants, such as Rosamond Radio, proposing 3-kilowatt facilities on "grandfathered" channel allotments requested prior to October 2, 1989.<sup>2/</sup>

Hitt, on the other hand, argues that Rosamond Radio's use of § 73.213 is improper. According to Hitt, the distance separation requirements specified in § 73.207(b), rather than those specified in § 73.213, must be used when § 73.215 is employed. Under this theory, Rosamond Radio's proposed facility is short-spaced to KRZE by 14.31, rather than 4 kilometers, which is in excess of the 8-kilometer restriction imposed upon applicants utilizing § 73.215. However, Hitt has cited nothing in the Commission's Rules or in any FCC decision to support its argument. Indeed, both the literal language of the Rules and simple common sense dictate that Hitt's theory must be rejected.

**2. Class A FM Applications Are Exempt From the 8 Kilometer Limit on Directional Facilities.**

In its Second Report and Order in MM Docket No. 88-375,<sup>3/</sup> the Commission states without qualification (at ¶ 57) that it is "... exempting ... [Class A] stations from the temporary 5 mile (8 kilometer) limit on short-spaced locations ...". Significantly, the Commission did not state that it was removing the 8-kilometer limit only for existing Class A stations and leaving it in place for new Class A stations. Moreover, in affirming the applicability of the Class A exemption in its Memorandum

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<sup>2/</sup> The Notice of Proposed Rule Making that led to the allotment of the Rosamond channel was adopted on July 18, 1989, and released on August 9, 1989. See 4 FCC Rcd. 6188 (1989). Thus, the petition for rule making was obviously filed well before the October 2, 1989, change in the spacing rules.

<sup>3/</sup> 4 FCC Rcd. 6375 (1989).

Opinion and Order, FCC 91-128, released May 30, 1991, at ¶ 22, the Commission, again, made no distinction between new and existing stations.

Under this "Class A" exemption to the 8-kilometer spacing restriction, no spacing requirements are applicable to Rosamond Radio's proposed directional facility. Although Hitt argues that the Class A exemption applies only to existing Class A stations seeking to improve their facilities and not to applicants, such as Rosamond Radio, for new stations, there is nothing in the Rules or in any published Commission decision that supports Hitt's assertion.

In this connection it is important to keep in mind that the 8-kilometer restriction has no interference implications. It was not imposed because the FCC had any doubts about the adequacy of the § 73.215 contour protection provisions. Rather, it was adopted purely as a temporary administrative tool to restrict the number of § 73.215 applicants its staff would have to process. Id. Therefore, no rational basis for disparate treatment of new as opposed to existing Class A stations is apparent. Accordingly, Rosamond Radio's proposed station can be short-spaced to the Ontario station by any distance whatsoever, whether it be 4 or 14 kilometers, as long as the appropriate § 73.215 contour protection requirements are met.

**3. Rosamond Radio's Proposal Complies  
With the 8 Kilometer Limit In Any Event.**

Even if the Commission determines that the 8-kilometer limit does apply in this case, it is clear from the wording of the FCC's Rules that Rosamond Radio meets the appropriate spacing requirements with respect to KRZE. Hitt argues--again without any authority--that § 73.215 mandates the use of the distance separations specified in § 73.207(b) and that no other separation standards may be used. However, although § 73.215 does refer to § 73.207, that cross-reference is not limited to the spacing requirements in subsection (b) of § 73.207. To the contrary, § 73.215 references all of

§ 73.207-- subsections (a) through (c)--and subsection (a) of § 73.207 in turn refers to the spacing requirements of § 73.213. Specifically, § 73.207 states at subsection (a) that the distance separation requirements of § 73.207(b) and (c) are applicable "[e]xcept for assignments made pursuant to § 73.213." The Rosamond Radio application involves just such a "§ 73.213 assignment."

Section 73.213(c) states that the distances listed in 73.213 apply to "new stations," such as that proposed by Rosamond Radio, "on channel allotments made by order granting petitions to amend the Table of FM Allotments . . . filed prior to October 2, 1989." Moreover, the Commission's Report and Order<sup>4/</sup> allocating the new channel to Rosamond expressly permits the use of the distance separation standards of § 73.213.<sup>5/</sup> Therefore, contrary to Hitt's assertion, Rosamond Radio has specific authority, both in § 73.215 of the Commission's Rules and in the Report and Order allocating the Rosamond channel, to use the separation requirements specified in § 73.213 rather than the separation requirements contained in § 73.207(b).<sup>6/</sup>

Further, simple logic dictates that § 73.213 must be applied here. Rosamond Radio is proposing a 3-kilowatt station. Section 73.213 defines the distance separation for 3-kilowatt stations. It would not make sense to apply the stricter 6-kilowatt

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4/ See Report and Order in MM Docket No. 89-344, 5 FCC Rcd. 7408 (1990).

5/ In the Report and Order, the Commission states that, since the Rosamond channel was being allotted pursuant to a petition filed prior to October 2, 1989, applicants for the allotment "may avail themselves of the provisions of § 73.213(a)(1) of the Commission's Rules." See 5 FCC Rcd. 7408 n. 4.

6/ It should be further noted that the Commission approved a similar application (File No. BMPH-900424ID) filed by Station KWRP(FM), San Jacinto, California. As set forth in the attached Technical Statement prepared by Milan Leggett, Rosamond Radio's consulting engineer, KWRP operates on Channel 241A, which is grandfathered with a maximum power of 3.0 kilowatts. The Commission approved KWRP's application which proposed a directional facility pursuant to § 73.215 of the Commission's Rules and utilized the distance separation requirements specified in § 73.213 of the Rules to determine its appropriate separation from Station KSIQ in Brawley, California.

standards of § 73.207 to a 3-kilowatt station, particularly where, as in this case, there is no potential for interference because a directional antenna is being employed.

Consequently, the clear language of the Commission's Rules, as well as the obvious purpose of those Rules, demonstrates that the distance separation requirements specified in § 73.213, rather than § 73.207(b), apply here. Utilizing the § 73.213 standards, Rosamond Radio's proposed facility is short spaced to KRZE by only 4 kilometers, which falls well within the 8-kilometer limit. Therefore, even if the temporary 8-kilometer restriction on the use of § 73.215 is applicable to Rosamond Radio's proposed Class A facility, that standard is satisfied, and Rosamond Radio's directional antenna proposal is acceptable for filing.

WHEREFORE, for the reasons set forth herein, Rosamond Radio, Inc. submits that the assertions set forth in the Objection filed by Diane K. Hitt are without merit and that the Objection should be denied.

Respectfully submitted,

  
Daniel F. Van Horn

  
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Counsel for Rosamond Radio, Inc.

August 2, 1991

ROSAMOND RADIO, INC.

TECHNICAL STATEMENT

This Technical Statement has been prepared for ROSAMOND RADIO, INC., ("Rosamond Radio"), applicant for a new FM broadcast station to operate on Channel 228A, grandfathered, in Rosamond, California, FCC File No. BPH-910225MG, and is in response to an Objection filed by a competing applicant for the same facility, DIANE K. HITT, ("Hitt"), FCC File No. BPH-910225MI. Hitt alleges that the Rosamond Radio application proposes a short-spacing that is in excess of that allowed under §73.215 of the Commission's Rules to Radio Station KRZE-FM, Channel 228A, grandfathered, Ontario, California.

Recently, the Commission has made several changes in the Rules that bear on this situation. First, MM Docket 87-121 permits FM station assignments to be short-spaced provided service contours of the affected stations are protected from interference. Such protection may be achieved by the use of directional antennas, power reduction, or terrain anomalies. A temporary restriction, limiting short-spacing to eight kilometers or less, is in effect at this time.

Another recent change in the Rules occurred in MM Docket 88-375 which increased the maximum transmitting power of Class A stations from 3.0 to 6.0 kilowatts provided new increased distance separation requirements to other affected stations or allotments are in compliance. Existing stations

ROSAMOND RADIO, INC.TECHNICAL STATEMENT continued

or allotments that were authorized as a result of a petition for rule making filed prior to October 2, 1989 and that do not or cannot comply with the new minimum distance separations are considered "grandfathered" under the previous minimum distance separation requirements and the previous maximum power of 3.0 kilowatts. Channel 228A, Rosamond, is a grandfathered allotment. KRZE-FM, licensed on Channel 228A, is a grandfathered station.

The Rosamond Radio application falls under the category of a grandfathered Class A station application because the allotment is the result of a petition for rule making filed prior to October 2, 1989. As such, the vacant channel coordinates assigned by the Commission, 34° 56' 56" north latitude and 118° 14' 07" west longitude do not comply with the new minimum distance separation requirements to KRZE-FM for a 6.0 kilowatt station but do comply with the requirements for a 3.0 kilowatts station using previous distance separations.

The Rosamond Radio application was filed under §73.213(c)(1) of the Commission's Rules and is in compliance with the minimum distance separation requirements of §73.213(c)(1) except for KRZE-FM, Channel 228A, grandfathered under previous rules, in Ontario, California. The proposal of Radio Rosamond is short-spaced to KRZE-FM by 4.32 kilometers based on the applicable separation table of §73.213(c)(1). Because it is not

ROSAMOND RADIO, INC.TECHNICAL STATEMENT continued

possible to serve Rosamond without terrain obstructions over parts of the community from a fully-spaced (105 kilometers) site without the use of a tall and prohibitively expensive tower for an antenna support. Rosamond Radio took advantage of the new contour protection rules of Docket 87-121 and proposed a directional antenna to protect the service contour of KRZE-FM. Likewise, the proposed service contour of Rosamond Radio does not receive interference from KRZE-FM.

Contrary to Hitt's contention in paragraph 2 of the Objection, the Rosamond radio application was filed using the provisions of §73.213(c)(1). It was stated as such both in the original application and in ENGINEERING AMENDMENT A filed in May 1991. Hitt also states in the same paragraph that the minimum distance separation table of §73.207(b) must be used if contour protection using a short-spaced site is proposed. Hitt quotes a reference in §73.215 to the separation table of §73.207 but totally ignores §73.207(a) which categorically exempts applicants for assignments pursuant to §§73.213 or 73.215 from compliance with the table. A portion of §73.207(a) is quoted here:

"(a) Except for assignments made pursuant to §§ 73.213 or 73.215, FM allotments and assignments must be separated from other allotments and assignments on the same channel (co-channel) and on near-by adjacent channels by not less than the minimum distances specified in paragraphs (b) and (c) of this section. The commission will not accept petitions to amend the Table of Allotments, applications



ROSAMOND RADIO, INC.TECHNICAL STATEMENT continued

for new stations, or applications to change the channel or location of existing assignments unless transmitter sites meet the minimum distance separation requirements of this section or such applications conform to the requirements of §§73.213 or 73.215....."  
(Emphasis added)

Hitt's contention that the separation requirements of 73.207(b) must be used in determining the distance of short-spacing is incorrect for other reasons. First, the vacant channel coordinates assigned by the Commission were such that the distance from the KRZE-FM transmitter site to the reference coordinates was 105 kilometers. This is the proper distance for grandfathered, 3.0 kilowatt, co-channel Class A FM stations. All other required minimum distance separations were in accordance with the new Class A 6.0 kilowatt spacings but these spacings are of no consequence. The determining factor is the spacing to the closest station or allotment which, in this case, is KRZE-FM. Had the reference coordinates been such that the Channel 228A Rosamond allotment was for a 6.0 kilowatt class A station, then the short-spacing would have been determined from the Class A 6.0 kilowatt minimum distance separation requirements. As the channel was allocated however, it could be nothing more than a 3.0 kilowatt station because it is within the Mexican border area and was notified to Mexico as a Class A station and was accepted by Mexico as a Class A station. An FM station operating with more than 3.0 kilowatts in the Mexican border area is considered by Mexico as at least a Class B station and must be accepted by Mexico as such.

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ROSAMOND RADIO, INC.

TECHNICAL STATEMENT continued

Finally, there is absolute proof that the Rosamond Radio application was filed in accordance with §§73.213 and 73.215. Radio Station KWRP, San Jacinto, California, FCC File No. BMPH-900424ID operates on Channel 241A, grandfathered with a maximum power of 3.0 kilowatts or the equivalent. Also, on Channel 241 is KSIQ, Brawley, California, operating as a Class B station. The required distance separation between these two facilities is 163 kilometers. In April 1990, KWRP (CP) filed an application stating on the first page that it was filed pursuant to §73.215 and §73.213. The application proposed a site that was located 161.1 kilometers from the transmitter location of KSIQ. This represents a short-spacing of 1.89 kilometers based on the separation table of §73.213(c)(1). To prevent overlap between the two stations, KWRP reduced power from the maximum .085 kilowatts to .060 kilowatts. The application was granted and KWRP is now operating. The distance separation requirements of §73.207(b) for these two stations, according to Hitt's contention would have been 178 kilometers. This would have represented a short-spacing of 17 kilometers, again according to Hitt's reasoning. Section 73.207(b) was not considered in any manner in the KWRP/KSIQ situation.

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FM Engineering Data Base -- Sorted by Country, State, City, Channel

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\*\*\* Notice \*\*\* Unofficial Secondary Source -- See Warning and Disclaimer in Section 0.434 of FCC Rules \*\*\* Notice \*\*\*

US CA San Jacinto

Owner:

N 33 48 13 W 116 59 39

Window Close: 870415

Horiz:

Vert:

Int. Status: USED

Near Mex border

73.215 does not apply

Last Updated on 890322 at 09:15:25

Rules Comment: # 18 - SITE RESTRICTED

USED 241A 96.1 MHz

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Dkt 84-231

Window Open: 870303

No Beam Tilt

Max HAAT: m

US CA San Jacinto

Owner: H.S.C. Radio, Inc.

N 33 49 47 W 116 57 11

Non-DA

Int. Status: OPER

Near Mex border

73.215 applies

Last Updated on 900910 at 15:12:45

KWRP

CP MOD 241A

96.1 MHz

BMPH90042410

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Horiz:

Vert:

.060

464

1160

No Beam Tilt

Max HAAT: 694 m

US CA San Joaquin

Owner:

N 36 36 24 W 120 11 06

Non-DA

Int. Status:

Not near border

73.215 does not apply

Last Updated on 890306 at 15:47:14

Rules Comment: EFFECTIVE 7-15-85

USED 288A 105.5 MHz

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Dkt 84-517

Window Open: 850613

No Beam Tilt

Max HAAT: m

US CA San Joaquin

Owner: Susan Lundborg

N 36 40 51 W 120 09 53

Non-DA

Int. Status:

Not near border

73.215 does not apply

Last Updated on 901128 at 20:35:00

NEW

CP 288A

105.5 MHz

BPH850712TE

Dkt 88-430

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Horiz:

Vert:

3.00

100

157

No Beam Tilt

Max HAAT: 107 m

US CA San Jose

Owner: San Jose Unified School District

N 37 12 59 W 121 50 39

Non-DA

Int. Status:

Not near border

73.215 does not apply

Last Updated on 881101 at 15:05:07

KLEL

LIC 207A

89.3 MHz

BLED830613DD

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Horiz:

Vert:

.100

-165

104

No Beam Tilt

Max HAAT: 59 m

US CA San Jose

Owner: San Jose State University

N 37 12 33 W 121 46 30

Non-DA

Int. Status:

Not near border

73.215 does not apply

Last Updated on 901128 at 20:35:00

KSJS

CP 214A

90.7 MHz

BPED871110NR

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Horiz:

Vert:

.250

120

381

No Beam Tilt

Max HAAT: 330 m

US CA San Jose

Owner: San Jose State University

N 37 20 09 W 121 53 04

Non-DA

Int. Status:

Not near border

73.215 does not apply

Last Updated on 891102 at 17:01:31

KSJS

LIC 214A

90.7 MHz

BLED1512

ERP(kW) Max(kW) HAAT(m) RCAMSL(m)

Horiz:

Vert:

1.00

-50

67

No Beam Tilt

Max HAAT: 57 m

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15-MAY-91

\*\*\* Notice \*\*\*

US CA Santa Mar

Owner: T

N 34 50 00

Non-DA

Int. Status:

Gen. Com

US CA Santa Mar

Owner:

N 34 54 30

Non-DA

Int. Status:

Gen. Com

US CA Santa Mar

Owner: G

N 34 54 30

Non-DA

Int. Status:

Gen. Com

US CA Santa Mar

Owner: G

N 34 54 30

Non-DA

Int. Status:

Gen. Com

US CA Santa Mar

Owner:

N 34 50 00

Non-DA

Int. Status:

Gen. Com

US CA Santa Mar

Owner: B

N 34 50 00

Non-DA

Int. Status:

Gen. Com

US CA Santa Mar

Owner: W

N 34 50 00

Non-DA

Int. Status:

Gen. Com

\*\*\* Notice \*\*\*

City, Channel Page 240  
 Bureau  
 tion 0.434 of FCC Rules \*\*\* Notice \*\*\*  
 1.1 MHz BLH850521KC  
 HAAT(m) RCAMSL(m)  
 173 549 No Beam Tilt  
 173 549 Max HAAT: 378 m  
 on 870204 at 00:00:00 Dkt 20966  
 88.7 MHz  
 HAAT(m) RCAMSL(m)  
 No Beam Tilt  
 Max HAAT: m  
 on 880711 at 00:00:00  
 88.7 MHz BPED850826ME Dkt 87-48  
 HAAT(m) RCAMSL(m)  
 -57 77 No Beam Tilt  
 -57 77 Max HAAT: 77 m  
 on 901128 at 20:35:00 Dkt 85-152  
 88.7 MHz Window Open: 860501  
 HAAT(m) RCAMSL(m)  
 No Beam Tilt  
 Max HAAT: m  
 on 910110 at 14:34:39  
 88.7 MHz BPED860529MC Dkt 89-9  
 HAAT(m) RCAMSL(m)  
 49 204 No Beam Tilt  
 49 204 Max HAAT: 204 m  
 on 910404 at 09:05:09 Dkt 84-231  
 88.7 MHz Window Open: 871028  
 HAAT(m) RCAMSL(m)  
 No Beam Tilt  
 Max HAAT: m  
 on 871110 at 00:00:00  
 88.7 MHz 880310MF  
 HAAT(m) RCAMSL(m)  
 182 413 No Beam Tilt  
 182 413 Max HAAT: 308 m  
 on 910103 at 16:33:35  
 Comment 890317-  
 tion 0.434 of FCC Rules \*\*\* Notice \*\*\*

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US CA Brawley Owner: SI 96 FM, Inc. N 33 00 30 W 115 31 28 Non-BA Int. Status: OPER Near Mex border 73.215 does not apply	K510 LIC 241B 96.1 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) 50. 62 23 No Beam Tilt 50. 62 23 Max HAAT: 81 m Last Updated on 850509 at 00:00:00	BLH810921AI Dkt 80-394
US CA Bridgeport Owner: Listeners' Network-Bishop, Inc. N 38 05 28 W 119 08 55 Non-BA Int. Status: Not near border 73.215 does not apply Gen. Comment: TRANSLATOR FOR KICQ, BISHOP, CA.	K261AY LIC 261B 100.1 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) No Beam Tilt Max HAAT: m Last Updated on 841211 at 00:00:00	
US CA Bridgeport, Lee Vining Owner: Western Inspirational Broadcasters, Inc. N 38 05 51 W 119 10 17 DA Make: Model: Rotate: Int. Status: Not near border 73.215 does not apply Gen. Comment: Translator for KNIB, Carson, NV	K209AM LIC 209B 89.7 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) .009 2558 No Beam Tilt Max HAAT: 556 m Last Updated on 900416 at 14:43:46	BLFT891113TC
US CA Buellton, etc. Owner: Canaling Broadcasting Corporation N 34 35 35 W 120 11 07 DA Make: Model: Rotate: Int. Status: Not near border 73.215 does not apply Gen. Comment: TRANSLATOR FOR KTYD, SANTA BARBARA, CA.	KTYB-1 LIC 260B 99.9 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) 0.60 354 No Beam Tilt Max HAAT: 222 m Last Updated on 910423 at 14:57:53	BLFT8900511TA
US CA Buellton, etc. Owner: Canaling Broadcasting Corporation N 34 35 36 W 120 11 19 DA Make: Model: Rotate: Int. Status: Not near border 73.215 does not apply Gen. Comment: TRANSLATOR FOR KTYD, SANTA BARBARA, CA.	K285EB CP 285B 104.9 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) .078 354 No Beam Tilt Max HAAT: 228 m Last Updated on 880711 at 00:00:00	BPFT870728TA
US CA Buena Park Owner: Buena Park School District N 33 51 35 W 118 00 53 Non-BA Int. Status: OPER Near Mex border 73.215 does not apply	KBPB LIC 211B 90.1 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) .019 3 No Beam Tilt .019 3 Max HAAT: m Last Updated on 760319 at 00:00:00	PLED1466
US CA Burbank Owner: Michael Sullivan N 34 12 54 W 118 16 29 DA Make: Model: Rotate: Int. Status: SOPER Near Mex border 73.215 does not apply Gen. Comment: CP CANCELLED 870413 *** Notice *** Unofficial Secondary Source -- See Warning and Disclaimer in Section 0.434 of FCC Rules *** Notice ***	K224AE CP 224B 92.7 MHz ERP(kW) Max(kW) HAAT(m) RCAMSL(m) .006 930 No Beam Tilt Max HAAT: 767 m Last Updated on 871209 at 00:00:00	BPFT850304TB

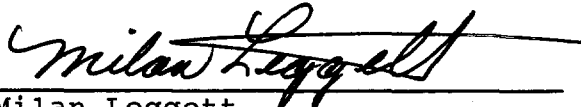
B 01..US A  
 C 01..US A  
 D 01..US A  
 E 01..US A  
 F 01..US A  
 G 01..US A  
 H 01..US A  
 I 01..US A  
 J 01..US A  
 K 01..US A  
 L 01..US A  
 M 01..US A  
 N 01..US A  
 O 01..US A  
 P 01..US A  
 Q 01..US A  
 R 01..US A  
 S 01..US A  
 T 01..US A  
 U 01..US A  
 V 01..US A  
 W 01..US A  
 X 01..US A  
 Y 01..US A  
 Z 01..US A  
 AA 01..US A  
 AB 01..US A  
 AC 01..US A  
 AD 01..US A  
 AE 01..US A  
 AF 01..US A  
 AG 01..US A  
 AH 01..US A  
 AI 01..US A  
 AJ 01..US A  
 AK 01..US A  
 AL 01..US A  
 AM 01..US A  
 AN 01..US A  
 AO 01..US A  
 AP 01..US A  
 AQ 01..US A  
 AR 01..US A  
 AS 01..US A  
 AT 01..US A  
 AU 01..US A  
 AV 01..US A  
 AW 01..US A  
 AX 01..US A  
 AY 01..US A  
 AZ 01..US A  
 BA 01..US A  
 BB 01..US A  
 BC 01..US A  
 BD 01..US A  
 BE 01..US A  
 BF 01..US A  
 BG 01..US A  
 BH 01..US A  
 BI 01..US A  
 BJ 01..US A  
 BK 01..US A  
 BL 01..US A  
 BM 01..US A  
 BN 01..US A  
 BO 01..US A  
 BP 01..US A  
 BQ 01..US A  
 BR 01..US A  
 BS 01..US A  
 BT 01..US A  
 BU 01..US A  
 BV 01..US A  
 BW 01..US A  
 BX 01..US A  
 BY 01..US A  
 BZ 01..US A  
 CA 01..US A  
 CB 01..US A  
 CC 01..US A  
 CD 01..US A  
 CE 01..US A  
 CF 01..US A  
 CG 01..US A  
 CH 01..US A  
 CI 01..US A  
 CJ 01..US A  
 CK 01..US A  
 CL 01..US A  
 CM 01..US A  
 CN 01..US A  
 CO 01..US A  
 CP 01..US A  
 CQ 01..US A  
 CR 01..US A  
 CS 01..US A  
 CT 01..US A  
 CU 01..US A  
 CV 01..US A  
 CW 01..US A  
 CX 01..US A  
 CY 01..US A  
 CZ 01..US A  
 DA 01..US A  
 DB 01..US A  
 DC 01..US A  
 DD 01..US A  
 DE 01..US A  
 DF 01..US A  
 DG 01..US A  
 DH 01..US A  
 DI 01..US A  
 DJ 01..US A  
 DK 01..US A  
 DL 01..US A  
 DM 01..US A  
 DN 01..US A  
 DO 01..US A  
 DP 01..US A  
 DQ 01..US A  
 DR 01..US A  
 DS 01..US A  
 DT 01..US A  
 DU 01..US A  
 DV 01..US A  
 DW 01..US A  
 DX 01..US A  
 DY 01..US A  
 DZ 01..US A  
 EA 01..US A  
 EB 01..US A  
 EC 01..US A  
 ED 01..US A  
 EE 01..US A  
 EF 01..US A  
 EG 01..US A  
 EH 01..US A  
 EI 01..US A  
 EJ 01..US A  
 EK 01..US A  
 EL 01..US A  
 EM 01..US A  
 EN 01..US A  
 EO 01..US A  
 EP 01..US A  
 EQ 01..US A  
 ER 01..US A  
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 GW 01..US A  
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 GZ 01..US A  
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RESTART

8  
RADIO ROSAMOND, INC.

TECHNICAL STATEMENT continued

MILAN LEGGETT states under penalty of perjury that  
the information contained in the attached Technical Statement  
is true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
Milan Leggett

July 31, 1991  
Date


**CERTIFICATE OF SERVICE**

I, Carol A. Moore, do hereby certify that I have caused a copy of the foregoing "Opposition to Objection" to be sent by first class United States mail, postage prepaid, this 2nd day of August, 1991, to the following:

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\_\_\_\_\_  
Carol A. Moore